

# MCKOOL SMITH

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July 31, 2024

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2270  
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen  
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

Plaintiffs Matthew Stein and Jerome Lhote and Nominal Defendant Luke McGee respectfully submit this letter to request that the Court adjust the schedule for the completion of discovery by three weeks.

The Court most recently had set a schedule by which expert discovery would be completed by October 4, 2024. ECF No. 127. The Court did so at the time that it extended the time for SKAT to file the 2021 Affidavit of Confession of Judgment through June 10, 2025. ECF No. 128.

The proposed Order filed with this letter modifies the schedule such that expert discovery would be completed by October 25, 2024.

The reason for the requested modification is because the expert retained by Plaintiffs and McGee has been tasked by a Danish judge with another time-sensitive project and requires additional time to complete his report. In addition, after his report is completed, it will need to be translated from Danish to English.

The Court's prior scheduling Orders are located at ECF Nos. 98 and 121.

Counsel for Skatteforvaltningen has consented to the requested modification of the schedule.

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Plaintiffs and McGee do not expect to seek further adjustment of the schedule for the completion of expert discovery.

Respectfully submitted,

/s/

Daniel W. Levy

Encl.

cc: All Counsel (by ECF)